

Mr. Phil Guidice, Commissioner  
Department of Energy Resources  
Commonwealth of Massachusetts  
100 Cambridge Street, Suite  
Boston, MA 02114

Dear Commissioner Guidice:

In response to the Massachusetts Department of Energy Resources (DOER) request for comments regarding proposed changes to biomass-related Renewal Portfolio Standards (RPS) as a result of recent Manomet Study results, I am submitting the following concerns about the practical on site application of the standards for removal of residuals from the forest.

We must be able to determine the volume of REC credit eligible residuals that will be removed from harvesting operations before the operation begins on a particular site. This can be done based on current available studies and reports. A chart should be generated to determine allowable removals for REC credits. The regulations approved by DOER should be included as an obligation in the DCR Best Management Practices and guidelines.

Third Party verification of harvests volumes and ratios during the first 24 months could be used to adjust the guidelines to local conditions. Including REC credit guidelines as regulations will not allow adjustments over time as the volumes are correlated

Verification of the 50% of retained residuals post harvest will present significant problems for both the Operators, the Biomass facilities as well as DCR service foresters. A predetermined volume available for REC credits will become a ceiling for REC credits on the harvest.

Respectfully Submitted,

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